

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

[illegible]

UNITED STATES OF AMERICA

-v-

TAHIR ALI KHAN,
a/k/a "Waheed Khan,"
a/k/a "Ali,"
a/k/a "Haji,"
a/k/a "Shan,"

FAYYAZ AHMED,
ARIE BENSHIMON,
a/k/a "the Jew,"
a/k/a "Jewish Guy,"

NAVEED ALI BHINDAR,
a/k/a "Sheikh,"

SYED HASSAN,
MUHAMMAD ISHAQ,
a/k/a "Saqi,"

BASHARAT JARRAL,
a/k/a "Alex,"

NADEEM KHAN,
GHULAM MEHMOOD,
a/k/a "Mama,"
a/k/a "Zafar,"

SHAHEEN MUKHTAR,
a/k/a "Nick,"

QAISER QURESHI,
a/k/a "Auntie,"

FRANKLIN RODRIGUEZ,
a/k/a "Spanish Guy,"
a/k/a "Chancey,"

OSCAR SANCHEZ,
a/k/a "Charsi,"
a/k/a "Bank of America,"

SYED SHAH,
a/k/a "Faisal,"
a/k/a "Chotu,"
a/k/a "Joji,"

PRADIPT SHARMA,
a/k/a "the CitiBank guy,"

..... Defendants.

Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offenses described in the Indictment as alleged in the Forfeiture Allegations, includes the following:

1. all right, title and interest in the real property and appurtenances known as [REDACTED] Carteret, New Jersey 07008, as well as any and all contents of that real estate property, including but not limited to furniture, furnishings, appliances, and electronics, including but not limited to those properties listed in Exhibit A;
2. all right, title and interest in the real property and appurtenances known as [REDACTED] Hoover, Alabama 35244-3294, as well as any and all contents of that real estate property, including but not limited to furniture, furnishings, appliances, and electronics, including but not limited to those properties listed in Exhibit B;

The Government further gives notice that, as an independent and separate basis, these above-described properties are forfeitable as substitute assets, pursuant to Title 21, United States Code, Section 853(p), as specified in the Indictment.

Dated: New York, New York
August 28, 2007

Respectfully Submitted,

MICHAEL J. GARCIA
United States Attorney

By: Lisa Zornberg / SK
LISA ZORNBERG
Assistant United States Attorney
Telephone: (212) 637-2720

AFFIRMATION OF SERVICE

RENEE SPILKER, pursuant to Title 28, United States Code, Section 1746, hereby declares under the penalty of perjury:

That I am employed at the Office of the United States Attorney for the Southern District of New York. That upon the electronic filing of the following document, on August 28, 2007, I caused one copy of the attached Government's Forfeiture Bill of Particulars to be delivered by mail and ECF to:

Steve Frankel, Esq.
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Counsel for Pradipt Sharma

I declare under penalty of perjury under the laws of the
United States of America that the foregoing is true and correct.

Dated: New York, New York
August 28, 2007


RENEE SPILKER

EXHIBIT A

EXHIBIT A**Partial Inventory of Items Observed at [REDACTED]
Carteret New Jersey, on August 15, 2007**

Location	Item
Family Room	Sony Bravia, Serial # 8015025 Linksys Wireless Router, Serial # CGNBIG215063 Cable Modem Leather Couch Computer Table
Laundry Room	Dryer - Kenmore 80 Series, Serial # MH3610500 Washer - Kenmore 70 Series, Serial # SM9710804-A
Other Room	Firestorm Rhino Bike Schwinn Rhythm Bike Strawberry Bike Dewalt Sawzall, Serial # 16130920071049 Dell TV, Serial # 74N7CC1
Garage	Toro Lawnmower, UPC # 2013820076 Leafblower, Serial # TK0462061 Toro Weedwacker, Serial # 033288 Hedge Trimmer - B & D Dewalt Drill, Serial # 34905820070749
TV Room	Sony Bravia, Serial # 800986 Bose Sound System, Serial # AM272176-00102 Fan / Air Purifier - Lasko Couch 1 Couch 2 Bedding
Dining Room	Dining Room Table & Chairs - Pulaskic (?) Furniture China Cabinet
Kitchen	Cuisnart Microwave, Serial # 060847390101440 Kenmore Refrigerator, Serial # SE4547749
Master Bedroom	Bedside Table - 1 & 2 Bedroom Bureau with Mirror Bedroom Dresser Bedroom Bed
Bedroom	Children's Bed Monitor, Serial # 9376BCA00002
Bedroom	Bed Monitor, Serial # CNN7050MT01 Toshiba TV/DVD, Serial # BCB560000535 Computer Table & Chair
Other	Vaccum Cleaner - Hoover Windtunnel, Serial # 38528-035 Planter (x2) Landscaping Bricks

Patio Table, Chairs, and Umbrella (5 Chairs and 1 Bench)
Grill - Charmglow, Serial # 7500-S-0703T0313 26
Bricks in Landscaper's Van
Canon Digital Video Camera DC210, Bar Code 642442042668

EXHIBIT B

EXHIBIT B**Partial Inventory of Items Observed at [REDACTED]
Alabama on August 15, 2007**

Location	Item
Guest Room 1	Wood bed frame with headboard
	Mattress and Boxspring
	Two Wood night tables
	Two Gold and Crystal lamps
	Wood dresser with mirror
	Tall wood dresser
	Area Rug
Living Room	Brown and beige window drapes
	Taupe/Yellow leather sofa
	Taupe/Yellow leather chair
	Taupe/Yellow leather chaise lounge
	Five gold and crystal coffee tables
	Two Beige leather sofas
	Beige leather chair
	70" flat screen television
	DVD player
	Surround sound system with speakers
	Coffee Table
	Two ceiling fans
	Carpeting
Dining Room	Two area rugs
	Large blue fountain
	Ceramic type fountain
	Dining Table with 8 chairs
	Wood china cabinet with china
	Wood bench
	Crystal chandelier
	Large vase
Child's Room	Marble/granite flooring
	Dark wood dresser with mirror
Entryway	Two area rugs
	White Table with mirror
Kitchen	Crystal chandelier
	Marble/granite flooring
	Refrigerator
	Range with hood
	Dishwasher
	Two Ovens
	Trash compactor
Marble/granite flooring	

	Microwave
	Seven white chairs
	Wall clock
	Skylight
Master Bedroom	Bed Frame with mattress and mirrored headboard
	Two attached side tables with glass shelves and mirrors
	Dresser with glass shelf and mirror
	Crib
	Carpeting
	Four area rugs
	Blue recliner
	Three drawers of assorted jewelry
Wood Deck	Gas Grill
	Metal Table with four metal chairs
	Glass top table with four black chairs
	Pontoon Boat
	Satellite dish
Front of House	Large stone lion
	Three tier stone fountain
Laundry Room/Garage	Two dryers
	Washing machine
Guest Room 2	Two area rugs
	Dark leather sectional couch
	Two glass top tables
	Dark wood bed frame with headboard and mattress
	Two dark wood night tables
	Dark wood dresser with mirror
	Tall dark wood dresser
	Wood wall hanging
Upstairs	Glass top table with six chairs
	Two blue couches